

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

JAY CONNOR	:	Case No. 2:23-cv-06127-RMG
	:	
Plaintiff,	:	Hon. Richard M. Gergel, District Judge
	:	
v.	:	
	:	
CHW GROUP INC. d/b/a CHOICE HOME	:	
WARRANTY	:	
	:	
Defendant.	:	

**AGREED MOTION FOR AN EXTENSION OF TIME
FOR DEFENDANT TO RESPOND TO PLAINTIFF'S COMPLAINT**

Plaintiff Jay Connor (“Plaintiff”), on behalf of Defendant CHW Group, Inc. d/b/a Choice Home Warranty (“Defendant”), with Defendant’s notice and permission, hereby respectfully notifies the Court that Plaintiff has agreed to further extend the responsive pleading deadline (currently January 26, 2024) for Defendant to answer, move, or otherwise respond to Plaintiff’s Complaint (*see* Dkt. 1) in this matter by a period of twenty-eight (28) days, to and including February 23, 2024, or however long the Court deems fit, so that the parties may continue exploring an extra-judicial resolution of this dispute without the need for incurring litigation expenses or burdening the Court.

Pursuant to Local Rule 6.01 Plaintiff would additionally provide the following information:

1. The current deadline for Defendant CHW Group, Inc. to answer, move or otherwise respond to the Plaintiff’s Complaint (*see* Dkt 1) is January 26, 2024.
2. The number of additional days requested to respond to Plaintiff’s Complaint is twenty-eight (28) days. The new deadline would be February 23, 2024.

3. The requested change would not affect other deadlines.

Wherefore, as Defendant has not retained local counsel or entered an appearance, Plaintiff certifies that prior to making this motion, the Defendant was consulted pursuant to rule 7.02. Plaintiff respectfully moves on Defendant's behalf to extend Defendant's deadline to answer, move or otherwise respond to the Complaint to February 23, 2024. No other deadlines will be impacted, as Defendant has not yet appeared and no other deadlines have been set. A proposed order has been included herewith for the Court's consideration and convenience.

WHEREFORE, for these reasons, Plaintiff (on Defendant's behalf) respectfully requests that the Court enter the attached proposed order, or a substantially similar order, extending the time for Defendant to answer, move, or otherwise respond to Plaintiff's Complaint (*see* Dkt. 1) in this matter by a period of twenty-eight (28) days, to and including **February 23, 2024**, along with granting all other relief deemed just and proper.

Dated: January 24, 2024

Respectfully submitted,

By: */s/ David A. Maxfield*
 David A. Maxfield, Fed ID 6293
 P.O. Box 11865
 Columbia, SC 29211
 803-509-6800
 855-299-1656 (fax)
 dave@consumerlawsc.com

Andrew Roman Perrong, Esq.
 (PA #333687, Pro Hac Vice Forthcoming)
Perrong Law LLC
 2657 Mount Carmel Avenue
 Glenside, Pennsylvania 19038
 Phone: 215-225-5529 (CALL-LAW)
 Facsimile: 888-329-0305
 a@perronglaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing motion was filed with the Court's ECF system on January 24, 2024, providing electronic service to all counsel of record.

/s/ David S. Maxfield
David S. Maxfield